

The transmission of radio-frequency carriers over utility lines not designed for said purpose should be closely examined. The interests of consumers, investors, and providers are all at stake.

Utility lines were not designed to act as balanced transmission lines for radio-frequency energy. They do not effectively contain the RF energy, nor do they shield the transported signal from external interference. It has been well established through field exercises that carriers from these systems can be heard using commonly available radio receivers. Contrast this to the cable television plant which makes every effort to contain its signal for greater efficiency, and to shield it from outside interference.

Quite simply, there are better ways for the power transmission and distribution industry members to use their rights-of-way to provide broadband services to consumers.

As an Amateur radio operator, my interest in this subject is multi-faceted. Most obviously, I do not wish to endure the types of interference this service will introduce to the Amateur spectrum. Particularly under emergency operating conditions, weak signals from underpowered stations can be difficult to receive. The addition of more man-made noise raises the bar in terms of station capabilities required to operate -- and station improvement is becoming increasingly difficult due to private land use restrictions.

I am also quite concerned about the effect my station may have on those in my neighborhood who might choose to subscribe to a broadband service provided over utility lines. Cable TV and a well-constructed telco plant have helped minimize unwanted interference to my neighbors' devices. When problems come up, they are generally easy to deal with. I would be very disheartened if a neighbor informed me they could not use their Internet connection whenever I was using my Amateur equipment. I fear I would be unable to assist in this case, since their Part 15 device would be doing its job - receiving signals from the utility lines.

The use of utility lines in this manner is both inefficient and irresponsible. I urge the Commission to consider the wide variety of services which would be impacted by allowing such use of valuable spectrum.

Sincerely,

Andrew Peterson